

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

Plaintiff,

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,
BETH E. BERNSTEIN, PAULA RAWL CALHOON,
MICAHAH P. CASKEY, IV, NEAL A. COLLINS,
JOHN RICHARD C. KING, ROBBY ROBBINS, J.
TODD RUTHERFORD, AND LEONIDAS E.
STAVRINAKIS, in their official capacities as
members of the HOUSE OF REPRESENTATIVES
LEGISLATIVE ETHICS COMMITTEE,

Defendants.

Civil Action No. 3:23-cv-00795-CMC

**SUPPLEMENTAL DECLARATION
OF CHRISTOPHER MILLS**

I, Christopher Mills, hereby declare as follows:

1. I am an attorney at Spero Law LLC and represent Plaintiff in the above case. I am over the age of 21 and am capable of making this unsworn declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or crime involving dishonesty, and the facts contained herein are within my personal knowledge.
2. The research on remedial issues reflected on the hours accounting I previously submitted (ECF No. 42-2, Exhibit 2) on 6/19/23, 6/20/23, 6/21/23, 6/22/23, and 6/27/23 will be used in responding to the Defendants' motion to alter or amend the judgment (ECF No. 43).
3. Around March 3, 2023, I received a call from counsel for the Defendants, Mark Moore, seeking an extension of time for the Defendants to answer the complaint filed in this case. I explained that such an extension would likely be fine but that I needed to consult with my client. After hanging up, Mr. Moore immediately called back and threatened to contest the Plaintiff's service of process—which was via hand-delivery on the House

Legislative Ethics Committee’s Chief Legal Counsel (*see* ECF No. 37)—if the Plaintiff did not agree to an extension. I conveyed that I did not share Mr. Moore’s apparent litigating approach and generally sought to agree to reasonable extensions of time. The Plaintiff subsequently agreed to the extension of time.

4. Much of my routine editing is performed with computer grammar, spelling, and style aids, including BriefCatch.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 18, 2023.

/s/ Christopher Mills
Christopher Mills